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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YUHUA CHEN,

Defendant.

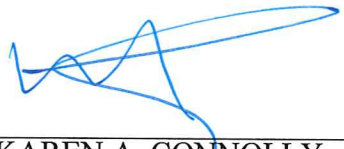
CASE NO.: 2:18-cr-00079-JAD-VCF

**YUHUA CHEN'S UNOPPOSED
MOTION TO CONDUCT A PRE-PLEA
PRESENTENCING INVESTIGATION
REPORT AND PROPOSED ORDER**

COMES NOW the Defendant, YUHUA CHEN, by and through her attorney of record, KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and hereby moves this Honorable Court to order that a Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation Department to determine Defendant Chen's criminal history. Based upon exchanges with the government, Assistant United States Attorney Susan Cushman, the calculation of Defendant Yuhua Chen's criminal history score needs to be clarified to determine if she qualifies for safety valve treatment.

In order to help facilitate a resolution to this matter, in the interests of judicial economy, it is respectfully requested that the United States Department of Parole and Probation be directed to prepare a pre-plea presentence investigation report as soon as possible.

DATED this 7 day of June, 2018.



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Attorney for Defendant, Yuhua Chen

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

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YUHUA CHEN,

Defendant.

CASE NO.: 2:18-cr-00079-JAD-VCF

ORDER

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant Yuhua Chen.

DATED this 13th day of June, 2018.



U.S. DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of Karen A. Connolly, LTD., and is a person of such age and discretion as to be competent to serve papers.

That on ~~May 31~~ ^{June 7}, 2018, she served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT by electronic service (ECF) to the person named below:

SUSAN CUSHMAN
Assistant United States Attorney



Employee of Karen A. Connolly, LTD.